

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

**BRADY TANNER, TIFFANY MOLDEN,)
LERESA HARRIS, ELENA EVANS,)
KIERA POWELL, SAMARRIA)
WRIGHT, THOMAS DUPRE, JESSICA)
HERMANSON, TODD SHIDER,)
CALONDRA HAYWOOD, JOLANDA)
LASSITER, CHASTITY SHORT,)
COURTNEY DAVIS, NIKILYA)
STEWART, STACY ZACKERY, WENDY)
MILNER, SONYETTE FLEMING,)
JESSICA CHRISTIAN, LATOYA FORD)
and SPENCER HARRIS Individually and)
on Behalf of All Others Similarly Situated,)**

Plaintiffs,

v.

TPUSA, INC.,

Defendant.

**CIVIL ACTION FILE NO.
1:12-CV-00033-WLS**

DEFENDANT TPUSA'S MOTION TO DECERTIFY THE CLASS

In this conditionally certified collective action under the Fair Labor Standards Act, TPUSA hereby moves for an order to decertify the conditionally certified class based on the arguments set forth in its Memorandum of Law, on file with this Court.

Dated: August 20, 2015

By: s/ Mary C. Dollarhide

Mary C. Dollarhide, admitted *pro hac vice*
marydollarhide@paulhastings.com
Taylor H. Wemmer, admitted *pro hac vice*
taylorwemmer@paulhastings.com
Betsey A. Boutelle, admitted *pro hac vice*
betseyboutelle@paulhastings.com
PAUL HASTINGS LLP
4747 Executive Drive, 12th Floor
San Diego, CA 92121
Telephone: 1 (858) 458-3000
Facsimile: 1 (858) 458-3005

Blake R. Bertagna, admitted *pro hac vice*
blakebertagana@paulhastings.com
PAUL HASTINGS LLP
695 Town Center Drive
Seventeenth Floor
Costa Mesa, CA 92626-1924
Telephone: 1 (714) 668-6200
Facsimile: 1 (714) 979-1921

Erika Patrick Leonard, Bar No. 565965
erikaleonard@paulhastings.com
PAUL HASTINGS LLP
1170 Peachtree Street, N.E.
Suite 100
Atlanta, GA 30309
Telephone: 1 (404) 815-2400
Facsimile: 1 (404) 815-2424

Attorneys for Defendant
TPUSA, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

**BRADY TANNER, TIFFANY MOLDEN,)
LERESA HARRIS, ELENA EVANS,)
KIERA POWELL, SAMARRIA)
WRIGHT, THOMAS DUPRE, JESSICA)
HERMANSON, TODD SHIDER,)
CALONDRA HAYWOOD, JOLANDA)
LASSITER, CHASTITY SHORT,)
COURTNEY DAVIS, NIKILYA)
STEWART, STACY ZACKERY, WENDY)
MILNER, SONYETTE FLEMING,)
JESSICA CHRISTIAN, LATOYA FORD)
and SPENCER HARRIS Individually and)
on Behalf of All Others Similarly Situated,)**

Plaintiffs,

v.

TPUSA, INC.,

Defendant.

**CIVIL ACTION FILE NO.
1:12-CV-00033-WLS**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 20, 2015, I electronically filed the foregoing **DEFENDANT TPUSA'S MOTION TO DECERTIFY THE CLASS** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Plaintiffs' counsel of record at the email addresses on file with the Court, as follows:

Steven Bennett Blau, Esq.
sblau@blauleonardlaw.com
Shelly A. Leonard, Esq.
sleonard@blauleonardlaw.com
BLAU LEONARD LAW GROUP, LLC
23 Green Street, Suite 303
Huntington, New York 11743
Tel. (631) 458-1010

Jason T. Brown, Esq.
jasonbrown@bbpc-law.com
Jason M. McLaren, Esq.
jasonmclaren@jtblawgroup.com
Michael Gerard Radigan, Esq.
michaelradigan@jtblawgroup.com
Nicholas R. Conlon, Esq.
nicholasconlon@jtblawgroup.com
JTB Law Group, LLC
155 2nd Street, Suite 4
Jersey City, NJ 07302
Tel. (877) 561-0000

Louis E. Hatcher, Esq.
lhatcher@watsonspence.com
Alfreda Lynette Sheppard, Esq.
ASheppard@watsonspence.com
WATSON SPENCE LLP
320 Residence Ave.
Post Office Box 2008
Albany, GA 31702-2008
Tel: (229) 436-1545

/s/Mary C. Dollarhide

Mary C. Dollarhide